

AO 91 (Rev. 11/11) Criminal Complaint

CLERK'S OFFICE U.S. DISTRICT COURT
AT ABINGDON, VA
FILED

UNITED STATES DISTRICT COURT

JUN 20 2022

for the

Western District of Virginia

JULIA G. DUDLEY, CLERK

BY: 

DEPUTY CLERK

United States of America

v.

JORGE EFRAIN PEREZ JR.

Case No. 2:22 MJ 12

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Nov 1, 2020 to Mar 7, 2022 in the county of Wise in the
Western District of Virginia, the defendant(s) violated:*Code Section**Offense Description*

21 U.S.C. §§ 846 and 841(b)(1)(A)

Knowingly and intentionally conspiring to distribute and possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, the use of which resulted in serious bodily injury or death.

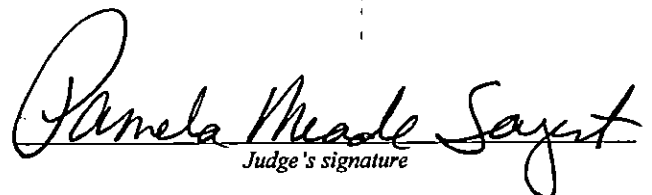
This criminal complaint is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.
Complainant's signature

Robert Wagner, USPIS Postal Inspector

Printed name and title

Sworn to before me ^{telephonically.} and signed in my presence.Date: 06/20/2022City and state: Abingdon, Virginia
Judge's signature

Pamela Meade-Sargent, USMJ

Printed name and title

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
Big Stone Gap Division

IN THE MATTER OF THE)
ARREST OF:)
JORGE EFRAIN PEREZ JR.)

Case No. _____

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Your affiant, Robert Wagner, a Postal Inspector with the United States Postal Inspection Service ("USPIS"), assigned to the Knoxville, Tennessee Domicile, having been duly sworn, deposes and states as follows:

INTRODUCTION

1. I am an investigative law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code, and I am empowered to, among other things, investigate criminal matters related to the USPIS and the U.S. mail. My duties include serving warrants and subpoenas issued under the authority of the United States, making arrests without warrants for offenses committed against the United States in my presence, making arrests for felony offenses, and making seizures of property. These offenses may be in Title 18 or Title 21 of the United States Code.

2. I have been employed as a Postal Inspector with the USPIS since 2006. I am currently assigned to the Knoxville Domicile of the USPIS' Atlanta Division. I am a 2006 graduate of the USPIS Academy and have completed several USPIS training courses. I have conducted investigations regarding the mailing of controlled substances into the states of Tennessee, Virginia, Washington, and the Territory of Guam. I have participated both as a case agent and co-case agent

in controlled deliveries of contraband and the execution of search warrants related to scheduled controlled substances. I also have conducted drug trafficking investigations in Tennessee, Virginia, Washington, and the Territory of Guam.

3. I am investigating the activities of JORGE EFRAIN PEREZ, JR. ("EFRAIN PEREZ"). I submit this application and affidavit in support of an arrest warrant for EFRAIN PEREZ, as there is probable cause to believe he has violated 21 U.S.C. §§ 846 and 841(b)(1)(A) by knowingly and intentionally conspiring to distribute and possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, on or about and between November 1, 2020, and March 7, 2022, within the Western District of Virginia and elsewhere, the use of which resulted in serious bodily injury or death.

4. The statements in this affidavit are based on information obtained from my observations and investigation, observations of cooperating sources ("CS"), and information I learned from discussions with other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing arrest warrants, I have not included every fact known to me concerning this investigation. I have set forth only the facts I believe are necessary to establish probable cause for the requested arrest warrants.

JURISDICTION

5. This Court has jurisdiction to issue the requested warrants because it is a "court of competent jurisdiction," as defined by 18 U.S.C. § 2711. Specifically, the Court is a "district court of the United States" that "has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i).

PROBABLE CAUSE

6. In 2021, law enforcement in Wise County, Virginia began investigating the distribution of counterfeit pressed pills containing fentanyl. Through various investigative techniques discussed below, law enforcement identified Paul Perkins ("Perkins"), Austin Lane ("Lane"), and Cheyenne Carico ("Carico") as individuals involved in the distribution of counterfeit pressed pills containing fentanyl. The investigation has revealed that from on or about and between February 1, 2021, and February 11, 2022, Perkins purchased pressed pills via social media from a source in California, Alexander Ortiz, and distributed them to others, including Carico and Lane, for further distribution in the Western District of Virginia. The distributions by Ortiz through Perkins are believed to have caused at least three overdoses in the Wise County area.

7. On November 24, 2021, juvenile CS1 was hospitalized due to an apparent drug overdose in Wise County, Virginia. CS1's medical records indicate he/she suffered acute respiratory failure with hypoxia due to an apparent drug overdose. A urine drug screen tested positive for marijuana and negative for opiates. A urine drug screen for opioids, such as fentanyl, was not performed. CS1 was placed on a ventilator for six days and hospitalized for over one week. When CS1 was removed from the ventilator, she told the medical staff that she had taken fentanyl pills the night of her overdose.

8. Law enforcement recovered half of a pressed pill from the scene of the overdose and sent it to the state laboratory for testing. The Virginia Department of Forensic Science laboratory provided a Certificate of Analysis stating the pill contained fentanyl, a Schedule II controlled substance. After conducting an interview with juvenile CS1, who has no known criminal history,

law enforcement determined CS1 purchased the pills (including both the ingested pill(s) and the half pill recovered from the scene) from Carico and Lane, who purchased the pills from Perkins.

9. On December 7, 2021, juvenile CS1 was interviewed by Southwest Drug Task Force Agent Kenneth Hill and Norton Police Department Sergeant Bucky Culbertson in the presence of his/her grandmother. CS1 stated the following during the interview:

a. CS1 was staying at his/her sister's house at the time of the overdose because he/she had gotten into an argument with his/her brother.

b. CS1 has known Carico for a while, but has known Carico's boyfriend, Lane, longer because he went to J.I. Burton High School with CS1.

c. Before CS1's overdose, Carico texted CS1 and asked if he/she needed any Percocet. CS1 asked Carico how much the Percocet would cost and Carico replied \$50. CS1 bought one pill from Carico. The pill CS1 got from Carico looked like a Percocet 30. There was a "M" on one side of the pill and the number "30" on the other side.

d. CS1 used Cash App or Paypal to send the money to Carico for the drugs. Carico and Lane then delivered the pill to CS1's sister's house and put it in the mailbox. Lane was driving his father's truck when he and Carico delivered the pill. CS1 went outside and retrieved the pill from the mailbox. CS1 then went back inside, into the bathroom, and took the pill.

e. CS1 said she had never bought pills from Carico before the overdose incident. Carico told CS1 she got the pill from Perkins. CS1 didn't see the messages until afterwards, but Carico messaged CS1 after he/she had taken the pill and said she just watched two people overdose but they were fine now, and for CS1 to take the pill during the daytime.

10. On December 9, 2021, Carico was interviewed by Southwest Drug Task Force Agent Kenneth Hill and Norton Police Department Sergeant Bucky Culbertson. Agent Hill read Carico her *Miranda* rights before questioning her. Carico advised she understood her rights and was willing to answer questions without an attorney. During the interview, Carico said the following:

a. Carico admitted CS1 paid her money for Percocet in November 2021, she thought through PayPal. Carico told CS1 she would get her pills after CS1 messaged her looking for Percocet on approximately the day before Thanksgiving 2021. Carico said she got the drugs for CS1 from Perkins. Carico acknowledged she knew the pills from Perkins were poison. She advised she personally didn't use the pills, but CS1 wanted them.

b. Carico advised she is the only one who knows Perkins "like that." He lives near the Burger King gas station in Big Stone Gap, Virginia.

c. Carico bought two pills from Perkins because CS1 told her he/she wanted two pills. Carico didn't get any pills for herself. Carico initially said Perkins charged \$30 per pill and CS1 sent Carico \$60 for the two pills. Carico later changed her statement regarding how much she charged CS1 for the pills. Carico said she paid Perkins \$60 for two pills and charged CS1 \$80 (\$40 apiece) for the pills. Carico said she exaggerated the price to CS1 so she could have extra money. Carico admitted she lied to CS1 and told him/her the pills cost more, so she could have gas money. Carico said she believed she had \$20 left after getting herself and Lane something to eat. Carico then changed the price of what she charged CS1 for the pills for a second time. Carico advised she told CS1 the pills were \$50 apiece. CS1 sent her \$100 and Carico made \$40 total off the two pills.

d. Carico advised that Lane drove her to get the pills from Perkins in his dad's

truck. Lane was aware they were buying pills when he drove her to Perkins. CS1 told Carico to stick the pills in the mailbox so his/her family wouldn't know. CS1 told Carico which mailbox to place the pills in. The pills were in a Zip-lock bag. Carico identified a photograph of the baggy that was taken from the scene of CS1's overdose by the Wise County Police Department.

e. Carico said on the night of CS1's overdose, she and Lane went to their friend CS2's house to play video games. CS2 ended up overdosing that night.

f. Carico messaged CS1 on the night of CS1's overdose and mentioned seeing two people overdose in the message. This was an exaggeration (she said she had seen two people overdose when she had only seen one person overdose) because she didn't want CS1 to overdose. Carico even had Lane drive her back up to CS1's location to check on him/her when he/she did not respond to Carico's message. CS1 replied to Carico prior to Carico and Lane getting there and told Carico he/she had only taken half of a pill.

g. Carico advised she had been helping get pills for CS1 for a little while and probably got him/her pills two to four times. She always got the pills from Perkins.

h. Carico claimed she has not gotten anything (pills) for other people—only for CS1. Carico advised Lane has never gotten pills for other people either. Carico admitted it was wrong for her to sell the pills to CS1. She knew the pills could potentially contain fentanyl.

11. On December 9, 2021, Lane was interviewed by Southwest Drug Task Force Agent Kenneth Hill and Norton Police Department Sergeant Bucky Culbertson. Agent Hill read Lane his *Miranda* rights before questioning him. Lane advised he understood his rights and was willing to

answer questions without an attorney. During the interview, Lane said the following:

a. Lane discussed the evening his friend CS2 overdosed in Norton, Virginia. This was the same night CS1 overdosed (November 24, 2021). Lane was with CS2 at CS2's home when he overdosed. They had "smoked" earlier that evening and were getting ready to play a video game. CS2 started trying to go to sleep, like he/she was passing out. The next thing Lane knew, CS2 was not breathing. Lane and CS2's brother tried to revive him. An ambulance was called, and CS2 eventually was revived.

b. The next day, Lane heard that another person also had overdosed who was his girlfriend (Carico)'s friend (CS1). Lane stated he knew there was a bad batch of pills coming from Perkins. Perkins had been selling pills for quite a while. Lane did not know Perkins' pills contained fentanyl until people started overdosing.

c. Lane said he thought CS1 got his/her pills from Perkins because CS1 contacted Carico trying to find pills. Carico told CS1 she knew someone who sells them (pills). Lane said Carico texted Perkins for CS1, then got the pills from Perkins and gave them to CS1. Lane stated he does not use pills and hasn't smoked since the night CS2 overdosed.

d. When questioned further about how CS1 got the pills, Lane said: "we got them for [him/her] and took them to [him/her]." Lane stated they went to Perkins' residence to get the pills because Perkins doesn't have a car. Perkins' house is right below the Burger King gas station in Big Stone Gap, Virginia. CS1 wanted two or three pills, but Lane was not sure of the exact amount. Lane stated CS2 was with them. CS2 went to Perkins' door to get the pills that were given to CS1. Lane thought Perkins charged \$30 or \$40 per pill. Lane

initially said he and Carico charged CS1 the same price as Perkins and did not make any money off the pills. He then stated he did not know how much money they (he and Carico) made from the pills because Carico was the one talking to CS1. Lane admitted he drove himself, Carico, and CS2 to get the pills at Perkins' residence and then to deliver the pills to CS1. CS1 was at his/her sister's house and CS1 told them to put the pills in the mailbox. Lane again stated he wasn't sure if CS2 got any pills for himself from Perkins, but said it was safe to say he did, since both CS2 and CS1 overdosed on the same night.

12. On December 15, 2021, Carico was re-interviewed by Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Senior Special Agent (SSA) Stephen Levesque, Southwest Drug Task Force Agent Kenneth Hill, Norton Police Department Sergeant Bucky Culbertson, and Assistant United States Attorney (AUSA) Lena Busscher. Carico was told the interview was voluntary and she was not under arrest and free to leave. She also was told she is a target of the investigation. Carico said she understood and wanted to proceed with the interview. Carico said the following during the interview:

a. Carico has known CS1 since high school. Carico sold pills to CS1 three to four times within the two-month period before CS1's overdose on November 24, 2021. Carico said Perkins is the "perc plug" in Norton, Virginia, but that CS1 was getting pills from other places, too. Carico knows fentanyl is dangerous and that even a small amount can kill you. She knew the pills she purchased from Perkins were probably pressed and contained fentanyl, since she hadn't heard of any pills in Norton that were not pressed.

b. Carico told CS1 the pills were \$50 each, but they only cost Carico \$30 each from Perkins. Lane drove Carico and was with her every time she purchased pills from

Perkins because Carico does not have a driver's license. Carico set up the deals; she did not allow Lane to talk to CS1. She made Lane block CS1 on social media.

c. On the day/night of CS1's overdose, around 10:00 p.m. to 11:00 p.m., Carico was at CS2's house. CS1 asked Carico on Snapchat if she could find any 30s (Percocet). Carico messaged Perkins. Lane, CS2 and his/her brother, and Carico went together to meet Perkins. Lane was driving his father's truck. They went to meet Perkins at the Burger King gas station in Big Stone Gap, Virginia, which is right below Perkins' house. When Carico talked to officers previously, she did not tell them CS2 and his/her brother were with them because she did not want to get them in trouble.

d. Carico said CS1 sent her \$100 for two pills through PayPal or Cash App. Carico paid Perkins \$60 in cash. Perkins handed the pills in the driver's side window to Carico. The two pills were in a Zip-lock bag. They then took the pills to CS1's relative's apartment in Wise, Virginia, and left them in the mailbox as instructed by CS1. Carico said in the past, she usually took the pills to CS1's house and put them in a bush.

e. After delivering the pills to CS1, Carico said she and Lane dropped off CS2 and his brother at their house and went to Lane's house. They dropped off Lane's father's truck and then went back to CS2's house. This is the point at which CS2 overdosed. When Carico and Lane got back to CS2's house, they were in the basement playing video games. They tried to wake up CS2 but could not. Carico knew something bad was happening and immediately called 911. Carico never saw CS2 use pills that night. The ambulance came and took CS2 to the hospital. It was his/her 18th birthday.

f. Carico said she has not talked to CS1 since he/she overdosed. She messaged

Perkins the night of the overdose on Snapchat and told him not to sell those pills to anyone else due to the overdoses. Carico said Perkins never opened her message and that she has not spoken to him since the night of the overdoses.

g. Carico described the pills purchased from Perkins on the night of CS1 and CS2's overdoses and in the past as blue circles imprinted with "M30." She said the first time she got pills from Perkins was in October 2021.

13. On December 15, 2021, Lane was re-interviewed by ATF SSA Stephen Levesque, Southwest Drug Task Force Agent Kenneth Hill, Norton Police Department Sergeant Bucky Culbertson, and Assistant United States Attorney (AUSA) Lena Busscher. Lane was told the interview was voluntary and he was not under arrest and free to leave. He also was told he is a target of the investigation. Lane said he understood and wanted to proceed with the interview. Lane said the following during the interview:

a. Lane said he and Carico have been together for nine to ten months. Lane has been living with Carico at his parent's house for approximately one month. Lane uses marijuana regularly. He used Percocet a few months ago, which he acquired from "Paul" (Perkins). Lane speculated the pills may be dirty.

b. Lane has known CS1 for a couple years through an ex-girlfriend and an old friend, Aaron Stidham. Lane knew through Aaron Stidham that CS1 used pills. Lane estimated that he and Carico had helped CS1 obtain pills a handful of times. On two occasions, CS1 purchased two pills, and the rest of the time, CS1 purchased one pill. Carico was always present when Lane delivered pills to CS1. CS1 would text or Snapchat message Carico asking for pills and would send her money to purchase them. Then, Lane and Carico

would drop the pills off for CS1. Lane and Carico charged CS1 \$50 for the pills each time, regardless of what Perkins charged them.

c. On the day/night of CS1's overdose, Lane said CS1 texted Carico and CS2 on Snapchat asking if they could get him/her pills. Carico and CS2 messaged Perkins to see if he had pills available, and Perkins messaged CS2 back telling him to come to his house. CS1 sent approximately \$100 for the pills to Carico, who then transferred part of the money to CS2. Lane, Carico, CS2, and CS2's brother all went to an ATM so CS2 could get cash for the transaction, and then the group continued to Big Stone Gap, Virginia, where CS2 retrieved the pills from the porch of Perkins' house. According to Lane, CS2 gave Carico a baggie containing two pills, which Carico placed in a mailbox for CS1.

d. Lane said after the transaction with Perkins, he and Carico dropped off CS2 and his/her brother in Norton and then continued to Wise to deliver the pills to CS1. Later that night, CS2 and his/her brother came to Lane and Carico's home and smoked marijuana, before taking Lane and Carico back to CS2's house to stay the night. Lane packed an Xbox to take to CS2's house. Once they arrived at the house and started playing video games in the basement, CS2 passed out. Lane denied seeing CS2 consume any pills and later stated CS2 must have taken them when he/she went upstairs for something. After CS2 passed out, Lane attempted to administer CPR while Carico called 911. When the police arrived, Lane and Carico were told to leave, and they walked to a friend (L.B.)'s house, where they stayed the remainder of the night. Lane stated he was unaware CS2 had purchased pills.

e. When asked to clarify when he and Carico had dropped CS2 and his/her brother off the night of the transaction/overdoses, Lane could not remember whether they

dropped them off before or after delivering the pills to CS1.

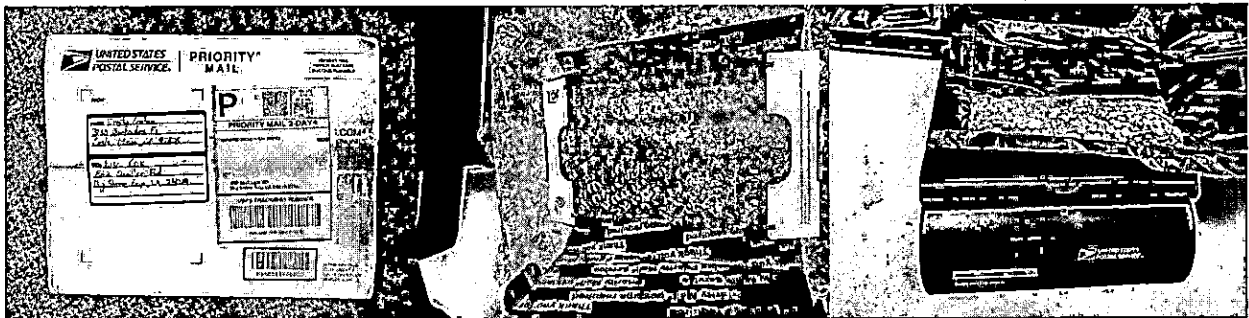
f. Lane stated that after CS2's overdose, Carico texted CS1 to tell CS1 not to take any more of the pills. CS1 replied that he/she had already taken a half but felt fine. Lane's friend, L.B., gave Lane and Carico a ride to CS1's house to check on CS1, but they could not get CS1 to come to the door.

g. Lane stated he had only ever obtained pills for CS1. Lane estimated he had been to Perkins' house on three occasions. Lane denied having knowledge of where Perkins obtained his pills and said he has had no contact with Perkins since the night of the overdoses.

14. On January 27, 2022, Southwest Drug Task Force Agent Kenneth Hill and ATF Senior Special Agent Ryan Temm re-interviewed Carico and Lane. Carico and Lane were each given Fraud and False Statement Warning forms, which they signed stating they understood what the form meant. Carico and Lane were each given a chance to review a summary of their previous interviews dated December 15, 2021. Carico stated she remembered that on the day of CS1's overdose, they had gone to buy pills at Perkins' house in Big Stone Gap, Virginia, instead of the Burger King gas station right below his house. Carico further said that on the night of the overdoses, CS2 had gone into the Black Diamond (gas station) with her when she took money out of the ATM. CS1 had sent Carico the money to pay for the pills to Carico's PayPal account. Carico then transferred the money to her Cash App account, and then transferred it to Lane's Cash App account because Carico had not yet received her own Cash App card. Carico used Lane's Cash App card to withdraw the money from Lane's account. Carico then gave the money to CS2, who bought the pills from Perkins. This was a change from Carico's statement dated December 15, 2021, when she said

she bought the pills directly from Perkins.

15. On February 10, 2022, I executed a federal search warrant (2:22-MJ-32 (EDTN)) on a USPS Priority Mail parcel bearing tracking number "9950 5065 7006 2034 2140 86" addressed to "Lisa Cox, 862 Quillen Rd., Big Stone Gap, VA 24219." Based on this investigation, I know that 862 Quillen Road, Big Stone Gap, Virginia, 24219, is Perkins' residential address. The parcel was mailed from "Emily Cortez, 3130 Barbados Pl., Costa Mesa, CA 92626" and found to contain approximately 4.3 ounces of light blue round pills marked "M" on side one and "30" on side two. The pills were in a Zip-lock plastic bag, contained inside a vacuum-sealed bag. The pills were sent to the state laboratory for testing. The Virginia Department of Forensic Science laboratory provided a Certificate of Analysis stating the pill contained fentanyl, a Schedule II controlled substance. The following are images of USPS Priority Mail parcel bearing tracking number "9950 5065 7006 2034 2140 86" addressed to "Lisa Cox, 862 Quillen Rd., Big Stone Gap, VA 24219" and the contents of such parcel during my execution of the search warrant.



16. On February 11, 2022, law enforcement officers conducted a controlled delivery of the above-mentioned parcel to the residence located at 862 Quillen Road, Big Stone Gap, Virginia 24219. A non-controlled substance was placed inside the parcel for the controlled delivery. Upon simultaneous execution of a state search warrant at the residence, a male subject, later identified as Perkins, had the parcel in his hands. Upon execution of the search warrant, law enforcement also

recovered approximately 200 pressed “M30” pills and \$6,000 cash in a metal box under Perkins’ bed. The pills recovered pursuant to the search warrant were sent to the state lab and tested positive for fentanyl, a Schedule II controlled substance.

17. At the time of the execution of the search warrant on February 11, 2022, USPI Jed Hutchison and I interviewed Perkins. Inspector Hutchison read Perkins his *Miranda* rights. Perkins verbally stated he understood his rights and verbally agreed to answer questions without an attorney present. Perkins stated the following during the interview:

a. Perkins began the interview by telling us he knew what he did was wrong. Perkins was asked what he was expecting in the package, and he replied, “fentanyl.” Perkins said approximately one year ago, he found his drug supplier while searching for pills on Snapchat. Perkins chatted on Snapchat with someone for about five minutes before buying some pills. It was not hard to order from the individual.

b. Perkins paid approximately \$50 through Cash App for the first 50-90 pills he purchased from the Snapchat supplier. The supplier (whom Perkins later identified as Snapchat account username “thequinlan29” and this investigation later identified as Alexander Ortiz) asked for Perkins’ address before sending a USPS tracking number for the package containing the pills. Perkins paid \$1.50 to \$2.00 per pill. Perkins started getting between 200-300 pills each transaction, but his supplier offered him a deal to buy more. Perkins estimated he has probably received six or eight packages from this supplier through the U.S. Mail.

c. Perkins was expecting between 700 to 1000 fentanyl pills in the parcel that was seized by law enforcement. Perkins ordered this last parcel about a month ago.

d. Perkins stated he got a new cell phone approximately three months ago. When he started using the new cell phone, Perkins forgot his Snapchat name and looked up his same supplier (later identified as Alexander Ortiz) on Instagram and started communicating with him that way. Perkins gave us permission to look at his cell phone and his Instagram account. Perkins showed us saved pictures containing tracking numbers for fentanyl pills he had ordered from the Instagram account "Lo Lo" or "galexy710", including the parcel law enforcement intercepted.

e. Perkins stated he ordered the fentanyl pills because he was addicted to them. He would take 30-50 fentanyl pills a day and would sell the rest for between \$15 to \$25 dollars per pill to pay for his addiction. Perkins stated he sold fentanyl pills to a female named Cheyenne (Carico), a male named Austin (Lane), and CS2. Perkins told the people he sold the pills to that the pills were laced with fentanyl. Perkins knew CS2 overdosed after taking pills CS2 bought from him and stated he didn't sell to CS2, Carico, or Lane anymore after CS2's overdose.

f. Perkins stated he only bought pills from the Instagram account username "galexy710". Perkins said "galexy710"'s packages came from at least five different addresses in California. Initially, "galexy710" told him the pills were like Oxys but with a different chemical. Perkins said after about the third package he ordered, he asked if the pills were laced with fentanyl and "galexy710" told him they were.

18. On February 18, 2022, Southwest Drug Task Force Agent Kenneth Hill and ATF SSA Temm interviewed Perkins. Perkins said he started buying what he believed to be Percocet from someone he found on Snapchat about seven months ago, in approximately summertime 2021.

He said he only made five to six purchases of pills, about one purchase every month or two. The first purchase was for 25-50 pills and was free. The last purchase, which was intercepted, was supposed to be 800 fentanyl pills and cost \$1,500 to \$2,000, which was sent via a money box (cash in a box via USPS). Some of the other purchases were made using Cash App. Perkins said the middle three to four purchases were for between 100-400 pills each. Perkins stated when he originally purchased the pills, he believed they were Percocet as they were sold as Percocet. He said after he used them, he realized they weren't Percocet and confronted the supplier. The supplier told him they were, in fact, fentanyl. The supplier was the person he had previously told law enforcement about—"galexy710" (Instagram name) (later identified as Alexander Ortiz). Perkins said he only sold pills to four people whom he could name, and that he only sold about 25-30 pills total, for as cheap as \$15 and as high as \$30 each.

19. On February 24, 2022, DTF Agent Hill, ATF SSA Temm and myself interviewed Perkins. Perkins reiterated that he had been on Snapchat looking through "stories" and found the account he confirmed to be his source, which he named as Snapchat account username "thequinlan29". Other people were posting "promos" that he found, or keywords and pictures that related to drug trafficking. The Snapchat account with username "thequinlan29" sent Perkins Snapchat videos showing 30,000-40,000 pills, weed, mushrooms, and other drugs available for sale. "Thequinlan29" told Perkins on Snapchat to contact him on Instagram at the account username "galexy710". Perkins said he created a new Instagram account for himself ("big.reddd4321"), contacted "galexy710" via Instagram, and did approximately half of his five to six purchases of pills using Instagram. The other half of the purchases were done using Snapchat.

20. On April 12, 2022, ATF SSA Temm received a federal search warrant (1:22MJ20

(WDVA)) return from Instagram for “galexy710’s” Instagram account. While reviewing the contents of “galexy710”’s Instagram account, I noticed that in all of “galexy710”’s publicly posted images, his face was concealed or blurred. Based on my training, experience, and conversations with other law enforcement officers, it is common for criminals to use social media to boast about and flaunt the success and fruits of their illegal conduct. Based on my training and experience, it is also common for criminals to conceal portions of photographs to remain anonymous to law enforcement.

21. On May 18, 2022, Carico and Lane entered guilty pleas in the United States District Court for the Western District of Virginia. Carico and Lane pleaded guilty to a one-count Information charging them with Conspiracy to Distribute and Possess with the Intent to Distribute 40 Grams or More of a Mixture or Substance Containing a Detectable Amount of Fentanyl, a Schedule II controlled substance, on or about and between February 1, 2021, and February 11, 2022, in violation of 21 U.S.C. §§ 846 and 841(b)(1)(B).

22. On May 20, 2022, ATF SSA Ryan Temm and Southwest Drug Task Force Agent Kenneth Hill interviewed CS2. CS2 stated on the day of his overdose, November 24, 2021, he/she, Lane, and Carico went to Perkins’ house to buy pills. CS2 said his/her brother was not with them. CS2 did not remember how many pills they bought in total, but he/she remembers buying at least two pills for him/herself. CS2 said he/she used one half of a pill while they were still in the car at Perkins’ home. CS2 said his/her grandparents were out of town, so they all went back to his/her house in Norton, Virginia. CS2 said he/she went upstairs and used the other half of the pill from Perkins and went back downstairs and that is when he/she overdosed. CS2 said up to that point, he/she was unaware the pills he/she had been buying from Perkins were fentanyl. CS2 bought one

or two pills a couple days a week over several months from Perkins. The pills cost CS2 \$30 each. CS2 said Perkins was getting his pills through the mail.

23. On May 24, 2022, Perkins entered a guilty plea in the United States District Court for the Western District of Virginia. Perkins pleaded guilty to a one-count Information charging him with conspiracy to distribute and possess with the intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, on or about and between February 1, 2021, and February 11, 2022, in violation of 21 U.S.C. §§ 846 and 841(b)(1)(B).

24. On May 31, 2022, Perkins testified under oath before a grand jury sitting in the Western District of Virginia, Abingdon Division. A review of the transcript revealed that Perkins testified as follows:

a. Perkins started purchasing fentanyl pills online from Snapchat user “thequinlan29” at some point in 2020. He later purchased fentanyl pills from the same source through the source’s Instagram account—“galexy710”. Perkins purchased the pills from “thequinlan29”/“galexy710” until February 2022. Perkins said he started out in 2020 purchasing pills every month to month and a half, and then purchased pills every two weeks for the last three to six months. Except for a couple times in the beginning, Perkins purchased 1000 pills each time. Perkins said 1000 pills cost \$3,750. He knew the pills from “galexy710” were fentanyl.

b. Perkins said sometimes he paid “galexy710” for the pills via Cashapp and sometimes he sent cash in a box through the U.S. Mail to an address provided by “galexy710”. The addresses “galexy710” provided were California addresses—usually from

the Turlock or Sacramento area. Perkins would send “galaxy710” a tracking number for the money box sent in the mail. Once the money was received, “galaxy710” would then send Perkins a tracking number for the pills, which were mailed to Perkins either at his residence at 862 Quillen Road, Big Stone Gap, Virginia, or his friend E.D.’s residence in Big Stone Gap, Virginia. Perkins said the pills sent to his residence were addressed to “Lisa Cox,” which is a fake name. Perkins recognized the names Ulises Elvira, Faith Jones, and Natalie Mena as people he sent money to for the pills purchased from “galaxy710”.

c. Perkins said that while he did not know “galaxy710”’s real name, he did video chat with “galaxy710” a couple times and saw his face during the video chats. Perkins described “galaxy710” as a “Mexican” male in his late 20s or early 30s with dark skin, braided ponytails, a goatee, and weighing approximately 180 pounds. Perkins was shown a photograph of Alexander Ortiz, which he said resembled “galaxy710”.

d. Perkins said his friend, Aaron Stidham from Appalachia, Virginia, also purchased fentanyl pills from “galaxy710” (Ortiz) beginning in 2020. Stidham and Perkins talked about purchasing pills from the same source online. Stidham started ordering the pills shortly after Perkins. Stidham ordered 1000 pills at a time from “galaxy710”.

e. Perkins confirmed that the package of fentanyl pills intercepted by law enforcement in February 2022 were pills he had purchased from “galaxy710” (Ortiz) about a month earlier for \$3,750. Perkins was expecting 1000 fentanyl pills in the package. Perkins also confirmed that the approximately 200 fentanyl pills found under his bed at the time law enforcement delivered the intercepted package had come from “galaxy710”.

f. Perkins said he distributed the pills he purchased from “galaxy710” to Carico,

Lane, CS2, CS2's brother, Aaron Stidham, M.A., T.A., and E.D. Perkins charged \$30 per pill. Most of the distributions took place from his residence in Big Stone Gap, Virginia, or at the Burger King gas station or Subway in Big Stone Gap, Virginia. Perkins sold 50 to 100 pills a week to some of his customers. The most pills he sold at a time were 200 to 300 pills to E.D. on two or three occasions.

g. Perkins testified that CS2, Lane, and Carico purchased four to six pills from him at his residence in Big Stone Gap, Virginia, on the night of CS1 and CS2's overdoses on November 24, 2021. Perkins charged them \$30 per pill. Perkins said the pills purchased by CS2, Lane, and Carico on November 24, 2021, came from "galaxy710".

25. On May 31, 2022, Carico testified under oath before a grand jury sitting in the Western District of Virginia, Abingdon Division. A review of the transcript revealed that Carico testified as follows:

a. From approximately October 2021 to February 2022, Carico and Lane purchased pressed pills laced with fentanyl from Perkins every day to every other day. She and Lane typically purchased two pills at a time, for \$30 per pill. Lane drove her to get the pills from Perkins because she does not have a driver's license. Carico said Perkins purchased the pills online and had them sent to him through the mail. Perkins told Carico he sold 50 to 100 pills at a time to some of his customers. Carico said Perkins is a major source of pressed pills in the Norton, Virginia, area.

b. Carico purchased pills from Perkins for CS1 on three to four occasions and charged CS1 \$50 per pill. On November 24, 2021, the night of CS1 and CS2's overdoses, Carico, Lane, CS2, and CS2's brother went to Perkins' house to purchase pills for

themselves and CS1. Carico and Lane got one pill to split, CS2 got one or two pills, and CS1 paid Carico \$100 via PayPal for two pills. Carico gave the money to CS2 to complete the transaction with Perkins. The group then delivered the pills to CS1 at his/her sister's house in Wise, Virginia, where they put the pills in the mailbox.

c. Carico said after they delivered the pills to CS1, they eventually went to CS2's house to play video games, which is where CS2 overdosed. It was CS2's eighteenth birthday. After the overdose, CS2 admitted he/she had gone upstairs to take more of a pill instead of sharing it with his/her brother.

26. On May 31, 2022, Lane testified under oath before a grand jury sitting in the Western District of Virginia, Abingdon Division. A review of the transcript revealed that Lane testified as follows:

a. From approximately October 2021 to February 2022, Carico and Lane purchased pressed pills laced with fentanyl from Perkins every day to every other day. He and Carico typically purchased one or two pills at a time, for \$30 per pill. Lane drove Carico to get the pills from Perkins because she does not have a driver's license. Lane said Perkins ordered the pills through the mail. Perkins told Carico he kept 50 to 100 pills on him at a time. Lane said Perkins is a major source of pressed pills in the Norton, Virginia, area.

b. Lane said he and Carico purchased pills from Perkins for CS1 on three to four occasions. Carico interacted with CS1 and charged CS1 \$50 per pill. On November 24, 2021, the night of CS1 and CS2's overdoses, Lane, Carico, CS2, and CS2's brother went to Perkins' house to purchase pills for themselves and CS1. Lane did not know it at the time, but CS2 told Lane later that he purchased pills for himself from Perkins. Carico and Lane

also got one pill to split, and CS1 paid Carico \$100 via PayPal for two pills. Carico gave the money to CS2 to complete the transaction with Perkins. The group then delivered the pills to CS1 at his/her sister's house in Wise, Virginia, where they put the pills in the mailbox. Lane was driving.

c. Lane said after they delivered the pills to CS1, they eventually went to CS2's house to play video games, which is where CS2 overdosed. It was CS2's eighteenth birthday. The day after the overdose, CS2 admitted he/she had gone upstairs to take a pill in the bathroom right before he/she overdosed.

27. On May 31, 2022, CS1 testified under oath before a grand jury sitting in the Western District of Virginia, Abingdon Division. A review of the transcript revealed that CS1 testified as follows:

a. CS1 said he/she started dating Aaron Stidham in November 2020 and at the time they started dating, Stidham was purchasing thousands of fentanyl pills at a time through the mail for further distribution in southwest Virginia. CS1 said Stidham purchased the pills through Snapchat from the same online source as Perkins. Stidham would purchase the pills every two to three weeks. Stidham sent boxes of vacuum-sealed cash through the mail to pay for the pills. This continued the entire time they were dating (at least until July 2021).

b. CS1 said Stidham and Perkins lived together on and off and argued over purchasing fentanyl pills from the same online source. CS1 has seen both Stidham and Perkins purchase pills online and package and send money for the pills through the mail. CS1 said both Perkins and Stidham sold fentanyl pills "in bulk" during the November 2020

to July 2021 period, while CS1 was dating Stidham.

c. CS1 said Carico and Lane purchased fentanyl pills for him/her from Perkins on four or five occasions, including on the night of CS1's overdose (November 24, 2021). On the night of CS1's overdose, Carico texted CS1 to see if he/she wanted any pills. CS1 sent Carico \$100 for two pills, he/she thought through Cash App. Carico and Lane delivered the pills to CS1's sister's house in Wise, Virginia, and left the pills in the mailbox. Lane was driving his dad's truck. Around 9 p.m., CS1 snorted one of the pills and laid down. CS1 woke back up and snorted part of the other pill, at which point he/she overdosed. CS1 did not take any other drugs on the day of the overdose. CS1 said he/she smoked marijuana a couple days before the overdose.

d. CS1 said he/she was hospitalized for over a week following the overdose. CS1 was placed on a ventilator for six days. When CS1 woke up, he/she told the medical staff he/she had taken fentanyl. CS1 said he/she gets recurring pneumonia due to the amount of fluid on his/her lungs during the overdose.

ORTIZ INSTAGRAM COMMUNICATIONS WITH PERKINS

28. While reviewing "galexy710" (Ortiz)'s Instagram account, I found multiple conversations between "galexy710" (Ortiz) and Perkins. Below are examples of conversations between Ortiz and Perkins.

29. On July 30, 2021, Perkins contacted Ortiz asking for his Snapchat account. A copy of the Instagram messages between Perkins and "galexy710" on July 30, 2021, are shown here:

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-07-30 02:57:45 UTC

Body Aye boss can you send me your snap

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-07-30 02:58:09 UTC

Body My snap got fucked and couldn't log back into it going have to make a new one

Author galaxy710 (Instagram: 47415120091)

Sent 2021-07-30 03:00:51 UTC

Body Bet and that's going out tomorrow boss

30. On September 24, 2021, based on my training and experience, participation in this investigation, and review of Instagram messages and USPS shipping records, Ortiz and Perkins spoke about coordinating a drug deal where Perkins would mail payment via the USPS to an address in California provided by Ortiz, who would then facilitate the mailing of pressed pills to Perkins' address at 862 Quillen Road in Big Stone Gap, Virginia. Specifically, Perkins mailed a USPS Priority Mail parcel bearing tracking number 950551191716126728025 and containing \$3,750 of U.S. currency to: Diana B, P.O. Box 665 Turlock, California. On September 28, 2021, Ortiz facilitated the mailing of USPS Priority Mail parcel bearing tracking number 9505506569911271096907 and containing a "load," which I know from participation in this investigation and my training and experience means 1000 fentanyl pills, from Costa Mesa, California to 862 Quillen Road in Big Stone Gap, Virginia. A copy of the Instagram messages between Perkins and "galaxy710" beginning on September 24, 2021, are shown here:

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-24 07:19:51 UTC

Body Yo boss I apologize iv been outta town with sum family doin work for them I stayed longer than I was supposed to

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-24 07:28:32 UTC

Body To just hang with my fam for a bit dont c. em much at all but my original phone broke the first or sec day while I was out there I didn't have any of my passwords to my media I rly didn't worry about fixing my phone until I was finna come back I tried to few ways to long back into my snap but the only way I was gonna get back on it was getting the code that it sent to the original phone I had used for it my ig didnt log me out on the phone but snap did I'm gonna get back into it here soon just wanted to msg real quick before I get back into my snap. I tried finding sum of your social media on my other phone but couldn't remember any of your shit I forgot that u went to Galaxy I was tryin find u on ig with lolife lol

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-24 07:29:51 UTC

Body I apologize tho I should have let you know before I left my town I was going to but my phone broke

Author galaxy710 (Instagram: 47415120091)

Sent 2021-09-24 07:29:53 UTC

Body You're good g lol my snap is mexican_ball1

Author galaxy710 (Instagram: 47415120091)

Sent 2021-09-24 07:30:08 UTC

Body I was just checking up making sure you're alright

Author

paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-24 07:34:50 UTC

Body Okay bet I'ma add u as soon as I log on snap. I'm only like maybe 2 hours away staying at a hotel 4 tha night heading back early n the morning pretty sure Im still set but I'm gonna go ahead n get witcha when I arrive back should b able to work with yuh tomo

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-24 07:35:39 UTC

Body appreciate yuh g you been alright homie

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-24 07:36:57 UTC

Body Is overnighting ☐☐ alright tho? I'd like to get it to u soon as possible

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-24 14:03:11 UTC

Body Aye I should be able to work with yuh today. Could u go ahead n send the name addy n stuff

Author galaxy710 (Instagram: 47415120091)

Sent 2021-09-24 14:03:58 UTC

Body Yeah you can overnight

Author galaxy710 (Instagram: 47415120091)

Sent 2021-09-24 14:04:03 UTC

Body Diana B

Author galex710 (Instagram: 47415120091)

Sent 2021-09-24 14:04:17 UTC

Body P.O. Box #665 Turlock, Ca 95381

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-24 15:14:22 UTC

Body Bet

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-24 15:18:07 UTC

Body Price? Is it Same as last on a load. N should have it out n like 2 hours I'll let yuh know # when I get it

Author galex710 (Instagram: 47415120091)

Sent 2021-09-24 15:43:02 UTC

Body Yeah same price

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-24 16:47:50 UTC

Body Okay bet g have it out soon

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-24 16:58:17 UTC

Body Yo my bad just making sure before I seal dont want it to end up being off is it 3750 or 3650 forgot that I got both of those numbers

Author galex710 (Instagram: 47415120091)

Sent 2021-09-24 17:08:55 UTC

Body 3750 gang

Instagram Business Record

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Author

paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-24 17:48:52 UTC

Body Bet homie. Send u tha # soon as I get it brotha

Author galex710 (Instagram: 47415120091)

Sent 2021-09-24 17:52:57 UTC

Body Bet bro

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 13:19:12 UTC

Body Yo g my bad forgot to send # I been caught up in sum bullshit it should land today or tomo

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 13:26:33 UTC

Body Instagram User sent an attachment.

Author galaxy710 (Instagram: 47415120091)

Sent 2021-09-27 15:44:41 UTC

Body Bet boss send me a name and addy for wen it lands

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 16:34:32 UTC

Body Gotcha g

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 16:35:49 UTC

Body Address- 862 Quillen Road. Big Stone Gap, Virginia, 24219,

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 16:36:13 UTC

Body Name- Lisa Cox

Author galaxy710 (Instagram: 47415120091)

Sent 2021-09-27 20:54:21 UTC

Body Bet gang

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 21:25:49 UTC

Body Appreciate you big time gang

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 21:26:49 UTC

Body Lmk if it landed or lands today homie g

Author galaxy710 (Instagram: 47415120091)

Sent 2021-09-27 21:27:08 UTC

Body Where did you send it from bro

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 21:27:52 UTC

Body My town g same place as always.

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 21:28:02 UTC

Body What's up?

Author galaxy710 (Instagram: 47415120091)

Author galaxy710 (Instagram: 47415120091)
Sent 2021-09-27 21:28:25 UTC
Body My bro has access to every package that he gets

Author galaxy710 (Instagram: 47415120091)
Sent 2021-09-27 21:28:30 UTC
Body And he doesn't see any from VA

Author galaxy710 (Instagram: 47415120091)
Sent 2021-09-27 21:28:44 UTC
Body what addy did you send to

Author paulperkins4321 (Instagram: 2226311330)
Sent 2021-09-27 21:29:18 UTC
Body Instagram User sent an attachment.

Author galaxy710 (Instagram: 47415120091)
Sent 2021-09-27 21:29:33 UTC
Body Oh bet the P.O. Box

Author galaxy710 (Instagram: 47415120091)
Sent 2021-09-27 21:29:35 UTC
Body Right

Author paulperkins4321 (Instagram: 2226311330)
Sent 2021-09-27 21:29:39 UTC
Body Po box 664 Turlock CA 95381 bro

Author galaxy710 (Instagram: 47415120091)

Sent 2021-09-27 21:29:43 UTC

Body 666

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 21:29:44 UTC

Body Ye

Author galaxy710 (Instagram: 47415120091)

Sent 2021-09-27 21:29:44 UTC

Body 665

Author galaxy710 (Instagram: 47415120091)

Sent 2021-09-27 21:29:50 UTC

Body 665 right

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 21:29:58 UTC

Body Yeah

Author galaxy710 (Instagram: 47415120091)

Sent 2021-09-27 21:30:10 UTC

Body Ok bet it should land I'll have my homies girl go

Author galaxy710 (Instagram: 47415120091)
Sent 2021-09-27 21:30:13 UTC
Body That's her pop box.

Instagram Business Record

Author
galaxy710 (Instagram: 47415120091)
Sent 2021-09-27 21:30:15 UTC
Body Po

Author galex710 (Instagram: 47415120091)

Sent 2021-09-27 21:30:20 UTC

Body I thought it got sent to merchant

Author galex710 (Instagram: 47415120091)

Sent 2021-09-27 21:30:27 UTC

Body I'll lyk soon as I get it

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 21:30:56 UTC

Body So is everything good did u track it

Author galex710 (Instagram: 47415120091)

Sent 2021-09-27 21:31:22 UTC

Body Nah I didn't ima track if it's not there later

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 21:31:58 UTC

Body Okay bet it's says for tomo but chick said possible Monday

Author paulperkins4321 (Instagram: 2226311330)

Sent 2021-09-27 21:32:09 UTC

Body What's merchant btw lol

Author galex710 (Instagram: 47415120091)

Sent 2021-09-27 21:32:16 UTC

Body The old addy you'd send to

Author paulperkins4321 (Instagram: 2226311330)
Sent 2021-09-28 03:33:47 UTC

Instagram Business Record

Body

It land today g ?

Author galaxy710 (Instagram: 47415120091)
Sent 2021-09-28 15:14:13 UTC
Body Yeah it landed gang

Author paulperkins4321 (Instagram: 2226311330)
Sent 2021-09-28 18:57:39 UTC
Body Okay bet.

EFRAIN PEREZ IDENTIFICATION AND INVOLVEMENT IN THE CONSPIRACY

31. A review of USPS business records showed that on September 28, 2021, USPS Priority Mail Parcel bearing tracking number 9505 5065 6991 1271 0969 07 was mailed by an individual at a post office in Costa Mesa, California. The individual utilized the self-service Kiosk (SSK) machine to purchase \$15.50 in postage. The SSK machine is a tool within post offices that allows customers to automatically pay for postage and manually affix it to their parcels. This is often used to by-pass the window counter that is manned by postal employees. The postage on the above-mentioned package was paid at the SSK using Visa debit card number 4403 4312 5817 1170, which is linked to Sutton Bank based on my investigation.

32. On June 10, 2022, I subpoenaed Sutton Bank for all identifiers and transactions linked to Visa card number 4403 4312 5817 1170.

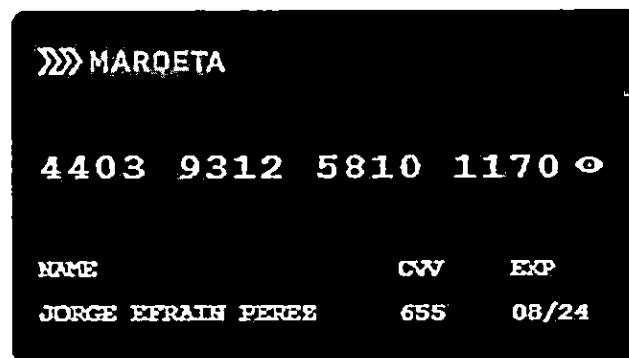
33. On June 16, 2022, I received the requested documents from Sutton Bank for Visa card number 4403 4312 5817 1170, which showed the account is registered to JORGE EFRAIN PEREZ with a date of birth February 19, 1998. The Sutton Bank records reflect the Visa card ending in -1170 was mailed via USPS to JORGE EFRAIN PEREZ JR. 10070 Gilbert Street, Apt. 96, Anaheim, CA 92804. The following is a screenshot of relevant Sutton Bank records:

Users / JORGE EFRAIN PEREZ / Card ••1170

• ACTIVE CARD

Card ••1170

Card details **Card transactions** **Card transitions** **Digital wallet tokens**



Report card lost or stolen

Terminate and issue a new card with a new card number.

Report card

—	Card shipping	
—	Method	USPS_REGULAR
—	Processing time	Normal
—	Card fulfillment status	Ordered
—	Name line 1	Jorge Perez Jr
—	Recipient address	Jorge Perez Jr
—		10070 Gilbert Street
—		96
—		Anaheim, CA 92804
—	Return address	Square Inc.
—		1455 Market St
—		San Francisco, CA 94103

34. On June 16, 2022, I searched the California Department of Motor Vehicles Database and found JORGE EFRAIN PEREZ JR. with the address 10070 Gilbert Street, Apt. 96, in Anaheim, California, and the date of birth February 19, 1998. The following is a copy of the relevant Department of Motor Vehicle Database record for EFRAIN PEREZ:

6/16/22, 12:12 PM

Department of Motor Vehicles Image - CAL-PHOTO

**CALIFORNIA DEPARTMENT OF MOTOR VEHICLES
IMAGE RECORD FOR:**

PEREZ JORGE EFRAIN JR

Y3474506

EXPIRES: 02/19/2027

CLASS:

SEX: M

HAIR: BLK

EYES: BRN

HEIGHT: 510

WEIGHT: 150

DATE OF BIRTH: 02/19/1998

ADDRESS: 10070 GILBERT ST APT 96, ANAHEIM, CA 92804

**PHOTO DATE:
03/17/2021**

**PHOTO OFFICE:
532**

**APPLICATION DATE:
03/17/2021**

**APPLICATION OFFICE:
532**

**ISSUE DATE:
03/17/2021**

**ISSUE OFFICE:
532**

RESTRICTIONS:

**PHOTO SEQ #:
4006**

ENDORSEMENTS:



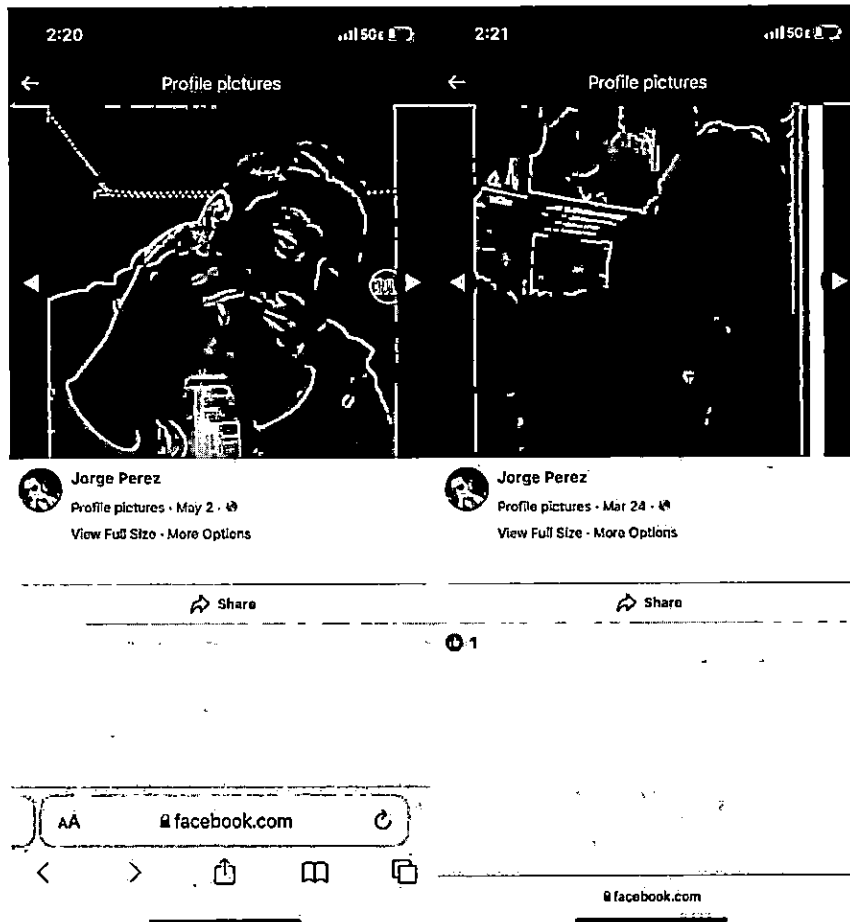
SIGNATURE:

A handwritten signature in black ink, consisting of stylized letters, followed by a horizontal line.

FINGERPRINT:



35. On June 16, 2022, a search of the social media site Facebook found an account with the name "Jorge Perez" with photographs resembling the EFRAIN PEREZ California DMV photograph. The following is a screenshot of profile photographs from the "Jorge Perez" Facebook account:



36. A review of USPS transaction records shows that between October 2020 and the present, EFRAIN PEREZ's Visa debit card 4403 4312 5817 1170 was used more than 150 times to purchase postage for outgoing U.S. Priority and Express Mail parcels from post offices located in California.

37. The USPS transaction records show that EFRAIN PEREZ's Visa debit card 4403

4312 5817 1170 was used to mail parcels from California to 862 Quillen Road, Big Stone Gap, Virginia (Perkins' residence) on five occasions from June 2021 to February 2022. The following is a list of the packages mailed with EFRAIN PEREZ's Visa card to Perkins' residence in Big Stone Gap, Virginia:

- 06-28-2021: USPS Priority Mail Parcel bearing tracking number 9505506570061179173975 was mail from Costa Mesa, CA.
- 07-02-2021: USPS Priority Mail Parcel bearing tracking number 9505506612111183631734 was mailed from Garden Grove, CA.
- 07-30-2021: USPS Priority Mail Parcel bearing tracking number 9505506611961211532431 was mailed from Fountain City, CA.
- 09-28-2021: USPS Priority Mail Parcel bearing tracking number 9505506569911271096907 was mailed from Costa Mesa, CA.
- 02-03-2022: USPS Priority Mail Parcel bearing tracking number 9505506570062034214086 was mailed from Costa Mesa, CA. This parcel was seized by law enforcement as discussed above in paragraph 15 and approximately 4.3 ounces of fentanyl pills were recovered.

ADDITIONAL PARCELS MAILED BY EFRAIN PEREZ

38. On January 16, 2022, Instagram user "eddiezinnturner" ordered 500 '30s', which I know from my training and experience and participation in this investigation to be pressed Percocet 30s, from Ortiz and asked if they could be shipped "2 day", which the USPS recognizes as Express mail shipping. Ortiz requested Instagram user "eddiezinntuner" pay with bitcoin and provided a crypto wallet address. The following is a copy of the Instagram messages between "eddiezinnturner" and Ortiz beginning on January 16, 2022:

Author eddiezinnturner (Instagram: 184905176)
Sent 2022-01-16 20:02:52 UTC
Body Need another order out tomorrow if you can brother

Author galaxy710 (Instagram: 47415120091)
Sent 2022-01-16 20:29:36 UTC
Body Bet gang what you lookin for

Author eddiezinnturner (Instagram: 184905176)
Sent 2022-01-16 20:33:37 UTC
Body 500 30s

Author eddiezinnturner (Instagram: 184905176)
Sent 2022-01-16 20:42:01 UTC
Body Same address

Author galaxy710 (Instagram: 47415120091)
Sent 2022-01-16 21:10:30 UTC
Body Btc or ?

Author eddiezinnturner (Instagram: 184905176)
Sent 2022-01-16 21:14:25 UTC
Body Cash app if you can

Author eddiezinnturner (Instagram: 184905176)
Sent 2022-01-16 21:14:51 UTC
Body Actually I can do btc fr whatever you prefer

Author eddiezinnturner (Instagram: 184905176)
Sent 2022-01-16 21:14:51 UTC
Body Actually I can do btc fr whatever you prefer

Author eddiezinnturner (Instagram: 184905176)
Sent 2022-01-17 02:44:10 UTC
Body Also could you make sure it's 2 day shipping □□□□□□□□

Author galaxy710 (Instagram: 47415120091)
Sent 2022-01-17 03:54:54 UTC
Body 3PbwfwzCXpauXW9xjY57djU6iqUSu4Ujzo

Author eddiezinnturner (Instagram: 184905176)

Sent 2022-01-17 04:00:57 UTC

Body Done!

Author galex710 (Instagram: 47415120091)

Sent 2022-01-17 04:09:57 UTC

Body Bet gang what's name and addy

Author eddiezinnturner (Instagram: 184905176)

Sent 2022-01-17 04:10:16 UTC

Body Andrew Lynch

1487 Hamlet st columbus Ohio 43201

Author eddiezinnturner (Instagram: 184905176)

Sent 2022-01-17 04:10:39 UTC

Body 2 day please need em here by Wednesday if possible

Author galaxy710 (Instagram: 47415120091)

Sent 2022-01-19 04:18:46 UTC

Body Runner said he's going to one day tomorrow boss my bad he wasn't able to get it out today

Author galaxy710 (Instagram: 47415120091)

Sent 2022-01-19 04:18:53 UTC

Body It'll be there Thursday

Author eddiezinnturner (Instagram: 184905176)

Sent 2022-01-19 05:09:49 UTC

Body Damnnn ok bet that's straight

Author eddiezinnturner (Instagram: 184905176)

Sent 2022-01-19 18:39:23 UTC

Body Reacted ♥ to your message

Author eddiezinnturner (Instagram: 184905176)

Sent 2022-01-19 18:40:23 UTC

Body Please make sure he get that out today and one day em i need em before the weekend family!

39. USPS records show that on January 19, 2022, EFRAIN PEREZ used his Visa debit card 4403 4312 5817 1170 in an Anaheim, California, post office to purchase \$48.45 in postage to mail USPS Express mail parcel bearing tracking number EI233051748US to 1487 Hamlet Street in Columbus, Ohio.

40. USPS records show that on March 23, 2022, EFRAIN PEREZ entered an Anaheim, California post office and used his Visa debit card 4403 4312 5817 1170 to purchase \$16.10 in postage to mail a U.S. Priority Mail parcel bearing tracking number 9505506830412082244518 to the same address mentioned above—1487 Hamlet Street in Columbus, Ohio. The following is a copy of a still photograph of EFRAIN PEREZ that was taken from the Anaheim, California USPS

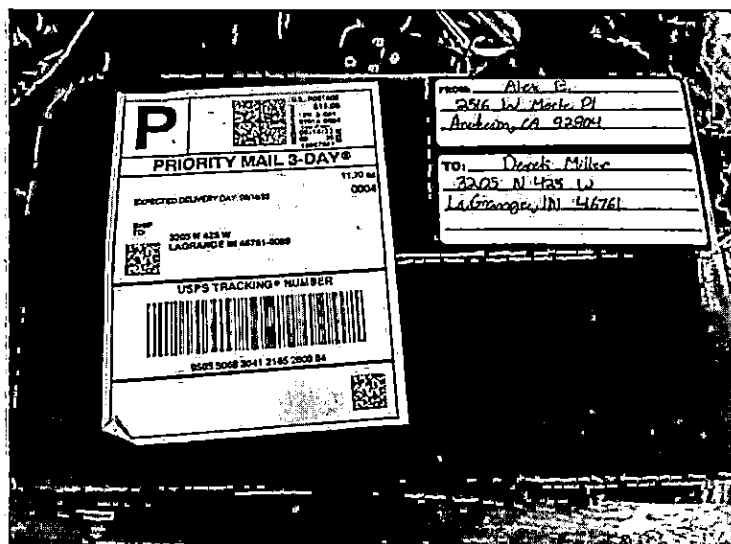
surveillance camera at the time EFRAIN PEREZ mailed the above-mentioned package to Columbus, Ohio, on March 23, 2022:

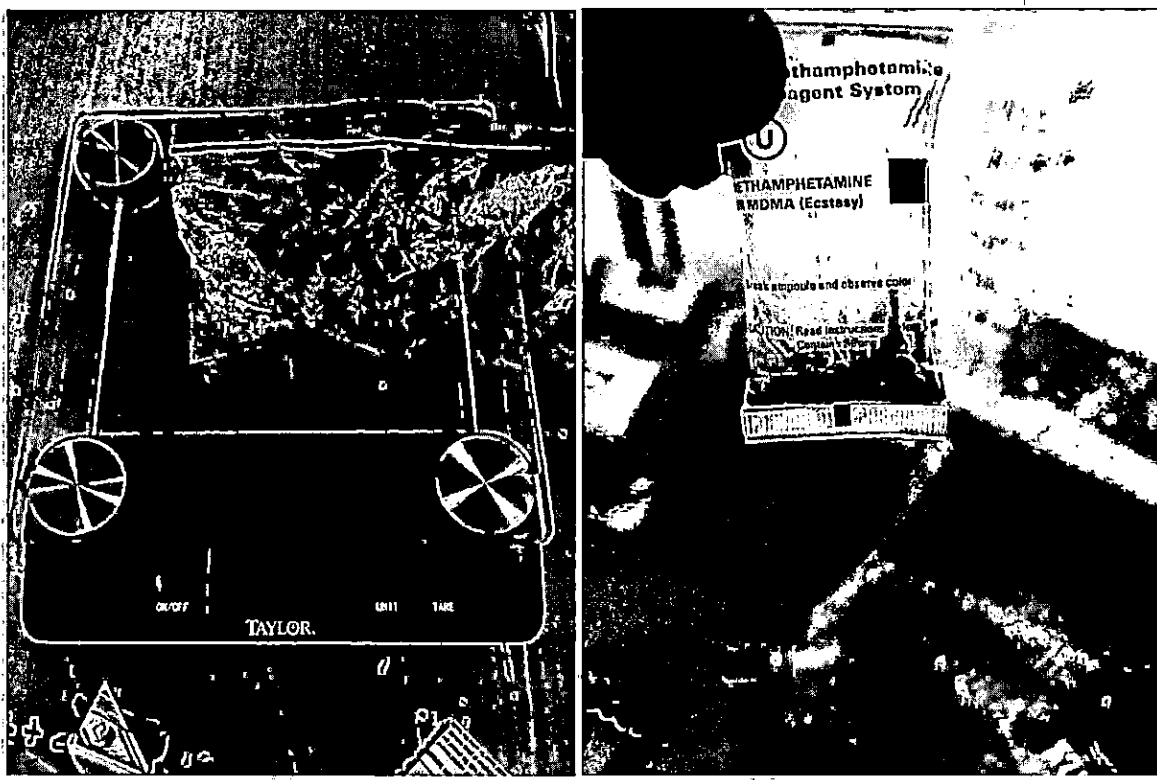


41. USPS records show that on June 14, 2022, EFRAIN PEREZ entered an Anaheim, California, post office and used the SSK machine to purchase \$11.60 in postage to mail U.S. Priority Mail parcel bearing tracking number 9505 5068 3041 2165 2600 84 to 3205 N 425 W, LaGrange, Indiana. The following is a copy of a still photograph of EFRAIN PEREZ that was taken from the Anaheim, California USPS surveillance camera at the time EFRAIN PEREZ mailed the above-mentioned package to LaGrange, Indiana, on June 14, 2022:



42. On June 17, 2022, Indianapolis, Indiana USPIS Inspectors intercepted the U.S. Priority Mail parcel 9505 5068 3041 2165 2600 84 from the mail-stream and obtained a search warrant for the parcel. Upon opening the parcel, Postal Inspectors seized approximately 24.5 grams of suspected MDMA (which field tested positive as such substance), currently classified as a scheduled I drug under the Controlled Substances Act. The following are photographs of the intercepted package and its contents:





CONCLUSION

43. Based upon the contents of this affidavit, I respectfully submit there is probable cause to believe that JORGE EFRAIN PEREZ JR. has violated Title 21 U.S.C. §§ 846 and 841(b)(1)(A).

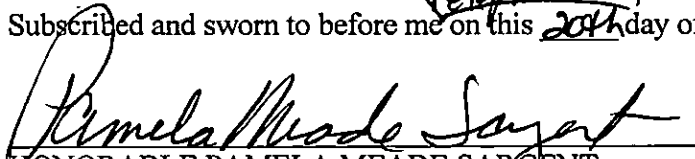
44. Therefore, I respectfully request that the Court issue an arrest warrant authorizing the arrest of JORGE EFRAIN PEREZ JR. for the above violations.

Respectfully submitted,

A/ Robert Wagner by pms

US Postal Inspector Robert Wagner
United States Postal Inspection Service

Subscribed and sworn to before me on this ^{telephonically} ~~20th~~ day of June, 2022.


HONORABLE PAMELA MEADE SARGENT
UNITED STATES MAGISTRATE JUDGE

Reviewed by: Lena Busscher, AUSA